CULPEPPER IP, LLLC

Kerry S. Culpepper, Bar No. 9837 75-170 Hualalai Road, Suite B204 Kailua-Kona, Hawai'i 96740

Telephone: (808) 464-4047 Facsimile: (202) 204-5181

E-Mail: kculpepper@culpepperip.com

Attorney for Plaintiff HB Productions, Inc.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

HB Productions, Inc.,) Case No.: 1:19-cv-487-JMS-KJM
) (Copyright)
Plaintiff,)
VS.) RULE 55(a) REQUEST FOR CLERK
) TO ENTER DEFAULT AGAINST
Muhammad Faizan, et al.,) DEFENDANT MUHAMMAD
) FAIZAN; DECLARATION OF
Defendants.) COUNSEL; CERTIFICATE OF
) SERVICE
)

REQUEST FOR CLERK TO ENTER DEFAULT AGAINST <u>DEFENDANT MUHAMMAD FAIZAN</u>

TO: CLERK OF THE ABOVE-ENTITLED COURT:

Pursuant to Fed R. Civ. P. 55(a), Plaintiff HB Productions, Inc. ("Plaintiff") hereby applies for entry of default by the Clerk of the Court against Defendant Muhammad Faizan. Defendant Muhammad Faizan was personally served a copy of

the Complaint, Summons and Scheduling Order on October 4, 2019. See Proof of

Service [Doc. #14]; see also Supplemental Declaration of Muhammad Wagar [Doc.

#21-2]. Service was performed in accordance with the Hague Service Convention

and the internal law or rule in Pakistan. See Affidavit of Muhammad Abeed Atiff

[Doc. #14-1].

Defendant Muhammad Faizan's responsive pleading was due on or before

October 25, 2019. Defendant Muhammad Faizan has failed to appear or otherwise

defend.

For these reasons, Plaintiff request that the Clerk of the Court enter default

judgment on all claims plead in the Complaint with regards to Defendant

Muhammad Faizan.

DATED: Kailua-Kona, Hawaii, November 25, 2019.

CULPEPPER IP, LLLC

/s/ Kerry S. Culpepper

Kerry S. Culpepper

Attorney for Plaintiff